

Message Information

Date 10/21/2010 05:09 PM
From ph.dayl@juno.com
To LisaP Jackson/DC/USEPA/US@EPA
cc
Subject Accept New York DEC's Chesapeake Watershed recommendations

Message Body

Paul Halstead
3673 St. Rt. 41
Cincinnati, NY 13040-2170

October 21, 2010

Lisa P Jackson
Administrator, Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460

Dear Lisa Jackson:

As a family farm supporter from the Chesapeake Bay watershed area, I ask that the Environmental Protection Agency (EPA) adopt the model refinements recommended by the New York State Development of Environmental Conservation (NYS DEC) in their Draft Phase I Watershed Implementation Plan as mandated by the U.S. Environmental Protection Agency (EPA) to restore the Chesapeake Bay and its watershed. These requested model refinements reflect the environmental protection accomplishments New York State has already attained and truthfully represent the environmental stewardship of New York's family farms.

Clean water is a priority of New York farmers, who have worked for many years to protect the state's water resources under the most progressive water quality standards in the country. In many instances, best management practices being performed on farms exceed what is being required by EPA. New York's state-wide environmental program achievements, as well as its unique landscape, growing conditions and seasonality - which differ from other five Bay watershed states - should all be accounted for in any Chesapeake Bay Program TMDL.

New York's farm communities in the Bay watershed have serious concerns that U.S. Environmental Protection Agency Region 3 (USEPA R3) has not accurately accounted for all pollutant reduction factors which are distinct and unique to New York. Unlike other Bay watershed states, New York's small portion of the Chesapeake Bay watershed is characterized by low population growth, low intensity agriculture, forest and high water quality. This is significant because the brunt of any nutrient load allocation requirement will fall squarely on our small family farms in the Bay watershed region in the absence of any other significant industry or population centers to satisfy USEPA R3 pollutant reduction targets.

Since 2004, the NYS DEC, in partnership with the New York State Department

of Agriculture and Markets, has been implementing a practical, programmatic, state-wide approach to nutrient and sediment reduction which has resulted in marked improvements to the Susquehanna River Basin region and, thereby, the Chesapeake Bay watershed. These existing state water quality and agricultural environmental management programs have established practices and standards which exceed federal minimum requirements and pre-date any EPA mandate.

For these reasons, please adopt the model refinements recommended by NYS DEC in their Draft Phase I Watershed Implementation Plan to accurately reflect New York's environmental accomplishments and New York agriculture's environmental stewardship.

Thank you for your consideration.

Sincerely,

Paul Halstead
607-836-8972

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